REMARKS

In the first Office Action mailed January 8, 2008, then pending claims 1-9 and 16-27 stand rejected under 35 U.S.C. §103 (a) as allegedly being unpatentable over Kozdon et al (US Patent No. 6,456,601 B1) ("Kozdon '601") in view of Lenihan et al (US Patent No. 5,127,004) ("Lenihan '004"). Furthermore, then pending Claims 11-15 stand rejected as allegedly being anticipated by Gallant et al (US Patent Application Pub. No. 2002/0136206) ("Gallant '206"). Still further, claims 16-17, 21, 26, and 27 stand objected to due to various alleged informalities.

Applicants respectively traverse. After a careful review of the Office Action, the cited references, and Applicants' clarifications to the pending claims, Applicants respectively request reconsideration in view of the following remarks.

I. STATUS OF THE CLAIMS

Currently pending are claims 6-9 and 11-26, of which claims 6, 11, 16, 19, and 26 are independent. All other claims are dependent. Applicants have amended all of claims 6-9 and 11-26 except for claim 18. Applicants have cancelled without prejudice claims 1-5 and 27.

II. APPLICANTS' PRESENTLY CLAIMED INVENTION

Applicants' presently claimed invention is generally directed to multicasting information in networks. More specifically, the presently claimed invention is directed to using servers to multicast announcements. Applicants' Specification p. 2 lines 3-4.

As Applicants' explain with respect to Figure 4, one example of an announcement server is described. An announcement server 400 includes an initiate announcements module 401, a broadcast announcements module 402, a determine announcement address module 404, and a

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communicate announcement address module 406. Applicants' Specification p. 20 line 22 – p. 21 line 2.

The determine announcement address module 404 receive network parameters 405 and is coupled 409 to the communicate announcement address module 406. The communicate announcement address module 406 is coupled 407 to a proxy or other network device. The initiate announcements module 401 is coupled 411 to the broadcast announcements module 402.

The initiate announcements module 401 determines when the announcements will be played to an address. This information is communicated to the broadcast announcements module 402 via the coupling 409. In one example, announcements may be played continuously. However, other timing examples are possible. Applicants' Specification p. 21 lines 3 – 11.

The broadcast announcements module 403 broadcasts announcements to a memory location or memory locations via the lead 403. The memory locations located within the Announcement Server and server as bindings between the Announcement Server and the announcement available to external entities via multi-cast addresses. For example, the memory locations may map an audio stream within the announcement server to RTP streams flowing out of the announcement server. Announcements may be in the form of any type of information. For example, the announcements may be ring tones, call-routing tones, call-hold tones, invalid destination tones, temporary unavailable tones, number-is-forwarded tones, and number is posted tones. Other examples of announcements are possible. The addresses are received via a lead 411 from the determine announcement address module 404. Applicants' Specification p. 21 lines 12 - 23.

The determine announcement address module determines the address or addresses whereby announcements are played. These addresses are communicated to the broadcast

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announcements module 402 and the communicate announcement address module 406. Network parameters 405 may include information that may affect the determination of the address. For example, network usage or memory usage may affect which memory location is used. In other examples, the address or addresses may be determined randomly.

The communicate announcement address module 406 may communicate the addresses determined by the determine announcement address module 404 to any entity that needs these addresses. For instance, a proxy may use these addresses. Applicants' Specification p. 22 lines 1 - 10.

Applicants' presently pending independent claims are generally directed to such a broadcast server that determines when the announcements will be played to an address. Applicants' Specification p. 21 lines 3 – 11. In addition, Applicants' presently pending independent claims have been clarified to expressly recite a system of multicasting announcements comprising a caller device and a proxy coupled to the caller device. An announcement server is coupled to the proxy and determines when selected announcements will be played to a plurality of addresses in a memory. This server broadcasts the selected announcements to addresses in memory and also communicates the plurality of addresses to the proxy. The proxy communicates an address of the plurality of addresses to the caller device and the caller device retrieves an announcement from the address. Applicants' remaining independent claims expressly recite similar limitations.

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III. CLAIM REJECTIONS UNDER 35 U.S.C. § 103 (a)

Claims 1-9 and 16-27 stand rejected under 35 U.S.C. § 103 (a) as allegedly being unpatentable over Kozdon '601 in view of Lenihan '004. Based on Applicants' presently pending claims, Applicants respectively traverse.

Kodzon '601 does not teach or suggest an announcement server that is coupled to a proxy and that further determines when selected announcements will be played to a plurality of addresses in a memory. Kodzon '601 also does not teach or suggest an announcement server that broadcasts selected announcements to addresses in memory and that communicates the plurality of addresses to the proxy. Consequently, Kodzon '601 naturally does not teach or suggest a proxy that communicates an address of the plurality of addresses to the caller device and that the caller device retrieves an announcement from the address.

Rather, Kodzon '601 is generally directed to audible telecommunication signaling, and more specifically, to a method and a system for providing call progress tones and audible announcements in a distributed, packetized network environment. Kodzon '601, Col. 1 lines 7 – 11.

Relying on Figure 3 and step 46 and Col. 6, lines 42-46 of Kodzon '601, the Examiner contends that Kodzon '601 discloses an announcement server that broadcasts "selected announcements to the addresses in the memory . . . , the announcement server communicating the plurality of address to the proxy and wherein the proxy communicates an address of the plurality of addresses to the caller device." January 2, 2008 Office Action p. 5.

Applicants' respectively traverse. Figure 3 of Kodzon '601 merely identifies a server 10 having certain process steps, one of which (step 46) is titled "Associate Signal With Addresses." According to Kodzon '601, this process step 46 merely mentions that "the stored tones and

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deliveries are associated with multicast addresses" and that this may be performed "by identifying the locations in memory space at which the call progress tones and deliveries are stored within the multicast server 10 or had disk locations of the music source." Kodzon '601 Col. 6 Lines 31 – 37. There is no mention or suggestion of Applicants' presently claimed invention, including that limitation that a proxy communicates an address of the plurality of addresses to the caller device and that the caller device retrieves an announcement from the address.

The other relied upon portion of Kodzon '601, Col. 6, Lines 42-46, is reproduced below:

> In the next step 48, multicast groups are defined. The telephony-enabled devices, within a multicast group transmit a request for registration within a multicast group by identifying the address or addresses of the desired call progress tones or the desired audio deliveries.

As can be seen from the portion of Kodzon '601 relied upon in the most recent Office Action, this portion of Kodzon '601 mentions: (1). defining multicast groups; (2). transmitting registration requests from the telephony-enable devices; and (3) identifying an address or addresses of the desired call progress tones or desire audio deliveries. These cited portions of Kodzon '601 fail to mention or suggest a proxy that communicates an address of the plurality of addresses to the caller device. These cited portions of Kodzon '601 also fail to mention or suggest that the caller device retrieves an announcement from the address as presently expressly claimed in Applicants' presently pending claim.

IV. CLAIM REJECTIONS UNDER 35 U.S.C. § 102 (e)

Claims 11-15 stand rejected under 35 U.S.C. § 102 (e) as allegedly being anticipated by Gallant '206. Based on Applicants' presently pending claims, Applicants respectively traverse.

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Gallant '206 does not teach each and every element of presently pending claim 11. In particular, Gallant '206 is not directed to multicasting, nor does Gallant '206 teach multicasting. Claim 11 has been amended to include elements that recite transmitting an announcement to at least one multicast address, transmitting a plurality of multicast addresses to a proxy, the proxy transmitting at least one multicast address to a caller device, the caller device determining when to listen to the least one multicast address, and the caller device listening to the least one multicast address. Thus, Gallant '206 does anticipate claim 11, nor does Gallant '206 anticipate claims 12-15, which depend from claim 11.

V. CLAIM OBJECTIONS

Claims 16-17, 21, 26, and 27 stand objected to due to informalities. Applicants have addressed the informalities to claims 16-17, 21 and 26 in the amendments to the claims. Applicants have cancelled claim 27. Thus, Applicants respectfully request that the objections be withdrawn.

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VI. SUMMARY

Applicants respectfully submit that, in view of the remarks above, the present application, including claims 6-9 and 11-26, is in condition for allowance and solicit action to that end.

If there are any matters that may be resolved or clarified through a telephone interview, the Examiner is respectfully requested to contact Applicants' undersigned representative at (312) 913-0001.

Respectfully submitted,

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